



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NEW YORK 10007

MICHAEL PESIN-VIROVETS
Senior Counsel
mpvirove@law.nyc.gov
Phone: (212) 356-2617
Fax: (212) 356-3509

June 3, 2022

BY ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: Angie Velez et al. v. Artem Prusayev, et al.
22-CV-1810 (FB) (VMS)

Your Honor:

I am a Senior Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney assigned to represent defendant City of New York (“City”) in the above-referenced matter. Defendant City writes pursuant to the Court’s May 25, 2022 Order, directing defendant City to advise the Court as to the progress of the Civilian Complaint Review Board (“CCRB”) investigation pertaining to Artem Prusayev. (See Electronic Order dated 5/25/2022.) For reasons set forth herein, defendant City respectfully requests an additional two weeks, until June 17, 2022, to provide the City’s full position on its stay request and position regarding representation of the individual defendant.

Upon information and belief, the CCRB closed its investigation into the incident alleged in the complaint on or about May 18, 2022 and referred the case to the CCRB’s Administrative Prosecution Unit (“APU”) for further action. Defendant City is further informed that on May 27, 2022, the APU filed its charges. At this time, CCRB is not able to provide an expected date of disposition as administrative prosecutions, which ultimately can result in a public trial before the Deputy Commissioner of Trials, can take several months, if not longer.¹

Because of this, defendant City respectfully requests an additional two weeks, until June 17, 2022, to ascertain its position on the need for a stay during the pendency of the administrative prosecution and regarding the representation of Officer Prusayev.

¹ This information is publicly available, and as such, this letter is not filed under seal.

The City thanks the Court for its consideration of this request.

Respectfully submitted,

By: /s/ 
Michael Pesin-Virovets
Senior Counsel

cc: **BY ECF**

Elena Louisa Cohen
Attorney for Plaintiffs
Cohen Green PLLC
1639 Centre Street, Suite 216
Ridgewood, NY 11385

Remy Green
Attorney for Plaintiffs
Cohen Green PLLC
1639 Centre Street, Suite 216
Ridgewood, NY 11385

Gideon Orion Oliver
Attorney for Plaintiffs
277 Broadway, Suite 1501
New York, NY 10007